

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA**

**Plaintiff**

**V.**

**CRIMINAL NO 15-162 (JAF)**

**JAVIER GONZALEZ-PEREZ (2)**

**Defendant**

\*\*\*\*\*

**MOTION FOR COURT ASSISTANCE**

**TO THE HONORABLE COURT:**

**COMES NOW DEFENDANT** JAVIER GONZALEZ-PEREZ represented by counsel and very respectfully alleges and prays as follow:

1. The defendant is presently detained at the Guaynabo Metropolitan Center.
2. The defendant and the undersigned are reviewing the evidence of the case. The evidence is very extensive and needs time to be reviewed.
3. Tomorrow the undersigned has a meeting with the prosecutor to discuss the evidence they have that directly affect our client.
4. Today the client called informing the undersigned that he will be moved out of the Island.
5. The move outside the court's jurisdiction will cause delay in the exam of the evidence.
6. In order to expedite our work we request the court's assistance in retaining the defendant in Puerto Rico for at least thirty days.
7. The undersigned is presently working with the evidence in a Capital Case pending before the court and will travel to Miami

from May 6 to May 7. For said reason we are requesting thirty days.

**WHEREFORE**, the defendant hereby requests that the court grants the motion and assist us in the discharge of our duty with both The Defendant and the Court.

**RESPECTFULLY SUBMITTED**

**In San Juan, Puerto Rico this 28<sup>th</sup> day of April, 2015.**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system which will send notification of this filing to the United States Attorney's Office in Puerto Rico and all parties in the case.

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